Washington State Auditor's Office **Audit Report**

Audit Services

Report No. 59103

COLUMBIA SCHOOL DISTRICT NO. 400

Walla Walla County, Washington

September 1, 1995 Through August 31, 1997

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Independent Auditor's Report On Compliance With Laws And Regulations At The Financial Statement Level (Plus Additional State Compliance Requirements Per RCW 43.09.260)

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements, as listed in the table of contents, of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998.

We conducted our audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

Compliance with laws, regulations, contracts, and grants applicable to Columbia School District No. 400 is the responsibility of the District's management. As part of obtaining reasonable assurance about whether the financial statements are free of material misstatement, we performed tests of the District's compliance with certain provisions of laws, regulations, contracts, and grants.

We also performed additional tests of compliance with state laws and regulations as required by *Revised Code of Washington* (RCW) 43.09.260. This statute requires the State Auditor to inquire as to whether the District complied with the laws and the *Constitution of the State of Washington*, its own ordinances and orders, and the requirements of the State Auditor's Office. Our responsibility is to examine, on a test basis, evidence about the District's compliance with those requirements and to make a reasonable effort to identify any instances of misfeasance, malfeasance, or nonfeasance in office on the part of any public officer or employee and to report any such instance to the management of the District and to the Attorney General. However, the objective of our audit of the financial statements was not to provide an opinion on overall compliance with these provisions. Accordingly, we do not express such an opinion.

The results of our tests disclosed no instances of material noncompliance that are required to be reported herein under *Government Auditing Standards*. However, we noted instances of noncompliance immaterial to the financial statements which are identified in the Schedule of Findings accompanying this report.

This report is intended for the information of management and the Board of Directors and to meet our statutory reporting obligations. This report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

Independent Auditor's Report On Internal Control Structure At The Financial Statement Level

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998.

We conducted our audit in accordance with generally accepted auditing standards and *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

The management of the District is responsible for establishing and maintaining an internal control structure. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures. The objectives of an internal control structure are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in accordance with the prescribed basis of accounting. Because of inherent limitations in any internal control structure, errors or irregularities may nevertheless occur and not be detected. Also, projection of any evaluation of the structure to future periods is subject to the risk that procedures may become inadequate because of changes in conditions or that the effectiveness of the design and operation of policies and procedures may deteriorate.

In planning and performing our audit of the financial statements of the District, we obtained an understanding of the internal control structure. With respect to the internal control structure, we obtained an understanding of the design of relevant policies and procedures and whether they have been placed in operation, and we assessed control risk in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide an opinion on the internal control structure. Accordingly, we do not express such an opinion.

Our consideration of the internal control structure would not necessarily disclose all matters in the internal control structure that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered to be material weaknesses. Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control structure that, in our judgment, could adversely affect the entity's ability to record, process, summarize, and report financial data consistent with the assertions of management in the financial statements. A material weakness is a reportable condition in which the

design or operation of one or more of the specific internal control structure elements does not reduce to a relatively low level the risk that errors or irregularities in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We noted no matters involving the internal control structure and its operations that we consider to be material weaknesses as defined above.

This report is intended for the information of management and the Board of Directors and to meet our statutory reporting obligations. This report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

BRIAN SONNTAG, CGFM STATE AUDITOR

Schedule Of Findings

 The number of vocational students was not properly reported to the Superintendent of Public Instruction.

The following condition was noted by District staff under the direction of the new administration. The District implemented a new system for the 1997-98 school year.

Description of Condition

Columbia School District is a member of the Tri-City Area Educational Cooperative (Tri-Tech Skill Center). The Tri-Tech Skill Center is a cooperative involving seven area school districts and is operated by the Kennewick School District. The skill center operates half-day programs which offer high school students a variety of occupational courses. We compared District and Skill Center enrollment records and found 33 students in fiscal years 1996 and 1997 that were reported as .6 FTE at Tri-Tech and also reported at .6 FTE at Columbia High School. As a result, students were overreported by .2 FTE for a total of 5.91 FTE overclaimed.

Cause of Condition

Tri-Tech, by agreement with Columbia School District, reported the students as .6 FTE. The students in question took more than two classes at Columbia High School. For each class taken at the high school, the students are reported as .2 FTE on the high school monthly enrollment reports (P223). The high school enrollment system did not take into consideration the .6 FTE that Tri-Tech was reporting. This resulted in the high school reporting students taking three classes at the high school as .6 FTE, respectively. When the Tri-Tech .6 FTE was added to the high school's FTE count, the result was students reported at more than 1 FTE.

Effect of Condition

Since SPI uses the monthly enrollment reports (P223) as a basis for state funding, the District may have been overpaid. Due to the complex nature of apportionment formulas applied by SPI, we did not estimate the amount due because SPI can recalculate the amount in a more cost effective manner.

Recommendation

We recommend the District implement written policies and procedures to ensure Tri-Tech monthly enrollment reporting complies with statutes. We further recommend the District contact SPI to determine the amount of any repayment required and submit revised P223 reports for the last year.

District's Response

The district agrees that 5.91 students who attend Tri-Tech were over claimed for the fiscal year 1995/96 and fiscal year 1996/97. The cause for this error was a flaw within the computer system dealing with skills center students. We implemented a different system prior to the start of the 1998 school year to correct the identified flaw.

Applicable Laws and Regulations

Washington Administrative Code (WAC) 392-121-136(1) states in part:

 \dots no student, including a student enrolled in more than one school district, shall be counted as more than one full-time-equivalent student on any count date or more than one annual average full-time-equivalent student in any school year \dots

WAC 392-121-122(e) defines full-time-equivalent, for students in grades 7 through 12, as twenty-five hours each week, or five hours (300 minutes) each scheduled school day.

2. The District did not accurately report basic education enrollment to the Superintendent of Public Instruction (SPI).

Description of Condition

Our review of basic education enrollment revealed elementary school enrollment was overclaimed for fiscal years 1996 and 1997. The total overclaimed for both years was approximately 3.22 full-time-equivalent students.

Cause of Condition

Students were overclaimed for the following reasons:

- Officials at the individual schools did not completely understand the enrollment regulations as prescribed by WAC.
- Officials at the individual schools did not keep adequate documentation to back up student amounts claimed.
- District officials were not monitoring enrollment counts in a manner sufficient enough to prevent possible reporting errors.

Effect of Condition

Since SPI uses the monthly enrollment reports (P223) as a basis for state funding, the District may have been overpaid. Due to the complex nature of apportionment formulas applied by SPI, we did not estimate the amount due because SPI can recalculate the amount in a more cost effective manner.

Recommendations

We recommend the District establish procedures to ensure accurate reporting of student enrollment. We further recommend the District contact SPI to determine the amount of any repayment required and submit revised P223 reports for the prior two years.

District's Response

The district agrees with the finding and through the audit process has become aware of the requirements. Attendance and administrative staff will receive follow-up training.

Auditor's Remarks

We would like to thank the District for its timely response to our findings and express our appreciation for the assistance and cooperation we received throughout the audit. Based upon the response, we believe the issues have been addressed. We will review these areas in our subsequent audit.

Applicable Laws and Regulations

Washington Administrative Code (WAC) 392-121-106 defines an enrolled student. WAC 392-121-108 describes enrollment exclusions. The SPI *Administrative and School Business Services Bulletin* 65-96 describes all other applicable enrollment requirements.

Independent Auditor's Report On Financial Statements

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the accompanying financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996. These financial statements are the responsibility of the District's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatements. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

As described in Note 1, the District prepares its financial statements on the cash basis of accounting prescribed by Washington State statutes and the *Accounting Manual for Public School Districts in the State of Washington*, which is a comprehensive basis of accounting other than generally accepted accounting principles.

In our opinion, the financial statements referred to above present fairly, in all material respects, the cash and unencumbered cash balances of Columbia School District No. 400 as of August 31, 1997 and 1996, and the revenues it received and expenditures it paid for the years then ended, on the basis of accounting described in Note 1.

In accordance with *Government Auditing Standards*, we have also issued a report dated April 1, 1998, on our consideration of the District's internal control structure and a report dated April 1, 1998, on its compliance with laws and regulations.

BRIAN SONNTAG, CGFM STATE AUDITOR

Independent Auditor's Report On Supplementary Information Schedule Of Federal Financial Assistance

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998. These financial statements are the responsibility of the District's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

Our audit was made for the purpose of forming an opinion on the financial statements of Columbia School District No. 400 taken as a whole. The accompanying Schedules of Federal Financial Assistance are presented for purposes of additional analysis and are not a required part of the financial statements. The information in the schedules has been subjected to the auditing procedures applied in the audit of the financial statements and, in our opinion, is fairly presented in all material respects in relation to the financial statements taken as a whole.

BRIAN SONNTAG, CGFM STATE AUDITOR

Independent Auditor's Report On Compliance With The General Requirements Applicable To Federal Financial Assistance Programs

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998.

We have applied procedures to test the District's compliance with the following requirements applicable to its federal financial assistance programs, which are identified in the Schedules of Federal Financial Assistance, for the years ended August 31, 1997 and 1996:

- Political activity
- Davis-Bacon Act
- Civil rights
- Federal financial reports
- Allowable costs/cost principles
- Administrative requirements, including subrecipient monitoring

The following requirements were determined to be not applicable to its federal financial assistance programs:

- Cash management
- Relocation assistance and real property acquisition
- Drug-Free Workplace Act

Our procedures were limited to the applicable procedures described in the Office of Management and Budget's (OMB) *Compliance Supplement for Single Audits of State and Local Governments* or alternative procedures. Our procedures were substantially less in scope than an audit, the objective of which is the expression of an opinion on the District's compliance with the requirements listed in the preceding paragraph. Accordingly, we do not express such an opinion.

With respect to the items tested, the results of those procedures disclosed no material instances of noncompliance with the requirements listed in the second paragraph of this report. With respect to items not tested, nothing came to our attention that caused us to believe that the District had not complied, in all material respects, with those requirements.

This report is intended for the information of management and the Board of Directors and to meet our statutory reporting obligations. This report is a matter of public record and its distribution is not

limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

BRIAN SONNTAG, CGFM

STATE AUDITOR

Independent Auditor's Report On Compliance With Specific Requirements Applicable To Nonmajor Federal Financial Assistance Program Transactions

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998.

In connection with our audit of the financial statements of the District and with our consideration of the District's control structure used to administer its federal financial assistance programs, as required by OMB Circular A-128, *Audits of State and Local Governments*, we selected certain transactions applicable to certain nonmajor federal financial assistance programs for the years ended August 31, 1997 and 1996. As required by OMB Circular A-128, we have performed auditing procedures to test compliance with the requirements governing allowability of the program expenditures and eligibility of the individuals or groups to whom the District provides federal financial assistance that are applicable to those transactions. Our procedures were substantially less in scope than an audit, the objective of which is the expression of an opinion on the District's compliance with these requirements. Accordingly, we do not express such an opinion.

With respect to the items tested, the results of those procedures disclosed no material instances of noncompliance with the requirements listed in the preceding paragraph. With respect to the items not tested, nothing came to our attention that caused us to believe that Columbia School District No. 400 had not complied, in all material respects, with those requirements.

This report is intended for the information of management and the Board of Directors and to meet our statutory reporting obligations. This report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

BRIAN SONNTAG, CGFM STATE AUDITOR

Independent Auditor's Report On Internal Control Structure Used In Administering Federal Financial Assistance Programs

Board of Directors Columbia School District No. 400 Burbank, Washington

We have audited the financial statements of Columbia School District No. 400, Walla Walla County, Washington, as of and for the years ended August 31, 1997 and 1996, and have issued our report thereon dated April 1, 1998.

We conducted our audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, issued by the Comptroller General of the United States, and the provisions of OMB Circular A-128, *Audits of State and Local Governments*. Those standards and OMB Circular A-128 require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

In planning and performing our audit, we considered the District's internal control structure in order to determine our auditing procedures for the purpose of expressing our opinions on the financial statements and to report on the internal control structure in accordance with OMB Circular A-128. This report addresses our consideration of internal control structure policies and procedures relevant to compliance with requirements applicable to federal financial assistance programs. We have addressed internal control structure policies and procedures relevant to our audit of the financial statements in a separate report dated April 1, 1998.

The management of the District is responsible for establishing and maintaining an internal control structure. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures. The objectives of an internal control structure are to provide management with reasonable, but not absolute, assurance that:

- Assets are safeguarded against loss from unauthorized use or disposition.
- Transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in accordance with the prescribed basis of accounting.
- Federal financial assistance programs are managed in compliance with applicable laws and regulations.

Because of inherent limitations in any internal control structure, errors, irregularities, or instances of noncompliance may nevertheless occur and not be detected. Also, projection of any evaluation of the

structure to future periods is subject to the risk that procedures may become inadequate because of changes in conditions or that the effectiveness of the design and operation of policies and procedures may deteriorate.

For the purpose of this report, we have classified the significant internal control structure policies and procedures used in administering federal financial assistance programs in the following categories:

Accounting Controls

Cash receipts Cash disbursements Payroll

• General Requirements

Political activity
Davis-Bacon Act
Civil rights
Federal financial reports
Allowable costs/cost principles
Administrative requirements, including subrecipient monitoring

• Specific Requirements

Types of services Eligibility

• Claims For Advances And Reimbursements

• Amounts Claimed Or Used For Matching

For all of the applicable internal control structure categories listed above, we obtained an understanding of the design of relevant policies and procedures and determined whether they have been placed in operation, and we assessed control risk.

The following internal control structure categories were determined to be insignificant to federal financial assistance programs:

Accounting Controls

Receivables
Accounts payable
Purchasing and receiving
Inventory control
Property, plant, and equipment
General ledger

• General Requirements

Cash management Relocation assistance and real property acquisition Drug-Free Workplace Act

• Specific Requirements

Matching, level of effort, earmarking Reporting Special requirements During the years ended August 31, 1997 and 1996, the District had no major federal financial assistance programs and expended 63 percent and 79 percent, respectively, of its total federal financial assistance under the following nonmajor federal financial assistance programs: Chapter I) Regular (CFDA 84.010) and School Lunch (CFDA 10.555).

We performed tests of controls, as required by OMB Circular A-128, to evaluate the effectiveness of the design and operation of internal control structure policies and procedures that we considered relevant to preventing or detecting material noncompliance with specific requirements, general requirements, and requirements governing claims for advances and reimbursements, and amounts claimed or used for matching that are applicable to the aforementioned nonmajor programs. Our procedures were less in scope than would be necessary to render an opinion on these internal control structures policies and procedures. Accordingly, we do not express such an opinion.

Our consideration of the internal control structure policies and procedures used in administering federal financial assistance would not necessarily disclose all matters in the internal control structure that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a reportable condition in which the design or operation of one or more of the internal control structure elements does not reduce to a relatively low level the risk that noncompliance with laws and regulations that would be material to a federal financial assistance program may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We noted no matters involving the internal control structure and its operation that we consider to be material weaknesses, as defined above.

This report is intended for the information of management and the Board of Directors and to meet our statutory reporting obligations. This report is a matter of public record and its distribution is not limited. It also serves to disseminate information to the public as a reporting tool to help citizens assess government operations.

BRIAN SONNTAG, CGFM STATE AUDITOR